

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 3:21-cr-00264
)	CHIEF JUDGE CRENSHAW
BRIAN KELSEY)	

MOTION TO CONTINUE THE TRIAL DATE

Comes now Brian Kelsey, by and through counsel of record, and hereby respectfully moves this Honorable Court to continue the trial date in this case. The trial of this matter is presently set to begin on Tuesday, January 18, 2021. Mr. Kelsey is moving the court to continue the trial date to a date to be determined during the status conference that is presently set for Monday, December 20, 2021, at 9:00 a.m.

As grounds for this motion, counsel for Mr. Kelsey would state and show that the estimated time for the trial in this case is two weeks. Paul Bruno, counsel for Mr. Kelsey, is scheduled to begin a quadruple homicide case in Davidson County, Tennessee on January 25, 2021. As such, he has a significant scheduling conflict with the current trial date in this case.

Also, the government has provided a significant amount of discovery to this point and has indicated that additional discovery is forthcoming. Due to the volume of discovery in this case, Mr. Kelsey and counsel for Mr. Kelsey do not believe they can review the discovery and be properly prepared for trial by January 18, 2021.

The government does not oppose this motion.

Based upon the foregoing, Mr. Kelsey moves the Court to continue the trial date that is currently set for January 18, 2022, to a date to be determined during the status conference that is presently set for Monday, December 20, 2021, at 9:00 a.m. Mr. Kelsey also moves the Court to

set a new status conference date, a new pretrial conference date, a pretrial motion filing deadline, and a pretrial motion hearing date.

Respectfully submitted,

s/ **Paul Bruno**

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s/ **David Rivera**

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Motion To Continue The Trial Date* has been electronically delivered to Amanda Klopf, Assistant United States Attorney, 110 Ninth Avenue, South, Suite A961, Nashville, TN 37203-3870; David Pritchard, Assistant United States Attorney, 167 North Main Street, Suite 800, Memphis, TN 38103; and John P. Taddei, U.S. Department of Justice, 1301 New York Ave. NW, Washington, DC 20530; this the 10th day of December, 2021.

s/ **Paul Bruno**
Paul Bruno